

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER
LOWER MANHATTAN DISASTER
SITE LITIGATION

21MC102(AKH)

HERMAN FRANCO,

08CV2621(AKH)

Plaintiff(s),

-against-

80 LAFAYETTE ASSOCIATES LLC, et al.,

Defendants.

**NOTICE OF ADOPTION BY
MAYORE ESTATES LLC, 80
LAFAYETTE ASSOCIATES
LLC, MAYORE ESTATES
LLC, and 80 LAFAYETTE
ASSOCIATION LLC, AS
TENANTS IN COMMON OF
ANSWER TO MASTER
COMPLAINT**

PLEASE TAKE NOTICE that defendant **NOTICE OF ADOPTION BY MAYORE ESTATES LLC, 80 LAFAYETTE ASSOCIATES LLC, MAYORE ESTATES LLC, and 80 LAFAYETTE ASSOCIATION LLC, AS TENANTS IN COMMON** for the building located at 22 Cortlandt Street (Subcellar Floors 1, 2, 3, and Floors 1, 2, 3) New York, New York 10007, (hereinafter “Mayore Estates/80 Lafayette”) as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint adding new defendants not previously served filed in the above-referenced action, herein adopts Mayore Estates/80 Lafayette’s Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). **MAYORE ESTATES/80 LAFAYETTE** has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

PLEASE TAKE FURTHER NOTICE THAT defendant, Mayore Estates/80 Lafayette reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 (¶¶ D(1)-(5)).

WHEREFORE, Mayore Estates/80 Lafayette demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
April 26, 2008

HARRIS BEACH PLLC
Attorneys for Defendant
MAYORE ESTATES LLC, 80 LAFAYETTE ASSOCIATES LLC, MAYORE ESTATES LLC, and 80 LAFAYETTE ASSOCIATION LLC, AS TENANTS IN COMMON

/s/

Stanley Goos, Esq. (SG 7062)
100 Wall Street, 23rd Floor
New York, New York 10005
(212) 687-0100

TO:

Paul Napoli, Esq.
Worby Groner Edelman & Napoli Bern LLP
115 Broadway, 12th Floor
New York, New York 10006
Attorneys for Plaintiff

Robert A. Grochow, Esq.
Robert A. Grochow, P.C.
233 Broadway, 5th Floor
New York, New York 10279
Liaison Counsel for Plaintiff

Gregory J. Cannata, Esq.
Law Offices of Gregory J. Cannata
233 Broadway, 5th Floor
New York, New York 10279
Liaison Counsel for Plaintiff

James E. Tyrrell, Esq.
Joseph Hopkins, Esq.

Patton Boggs LLP
One Riverfront Plaza, 6th Floor
Newark, New Jersey 07102

Liaison Counsel for the Defendants

All Counsel via ECF

CERTIFICATION AS TO SERVICE

The undersigned certifies that on April 26, 2008, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of Adoption by Mayore Estates LLC, 80 Lafayette Associates LLC, Mayore Estates LLC, And 80 Lafayette Association LLC, as Tenants in Common of Answer to Master Complaint.

Dated: April 26, 2008

/s/
Stanley Goos, Esq. (SG 7062)